

# NENA

## The 9-1-1 Association

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1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch, *Secretary*  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

January 23<sup>rd</sup>, 2017

*In re* Onvoy Spectrum, LLC, *Petition for Waiver of Section 52.15(g)(2) of the Commission's Rules Regarding Access to Numbering Resources*, WC Dockets Nos. 13-97, 07-243, 04-36; CC Docket No. 99-200; PS Docket No. 10-255.

Dear Ms. Dortch:

I write to provide brief comments of the National Emergency Number Association, Inc., in support of Onvoy Spectrum, LLC's petition for access to *wireless* p-ANI numbering resources in the context of providing a *VoIP*-type service.

As we read Onvoy's petition, it does not seek a waiver of the authorization requirement contained in § 52.15(g)(2) of the Commission's rules. Rather, we read the petition to seek a determination that the North American Numbering Plan Administrator's (i.e., Neustar's) criteria for determining whether an applicant is, in fact, authorized extend beyond the requirements of the rule. To the extent that our reading is consistent with Onvoy's intent, we support the petition, and urge the Commission to grant the requested relief.

NENA cannot fault Neustar for attempting to establish sensible criteria for the evaluation of requests for wireless p-ANI resources. Clearly *some* gating criteria must be established for this purpose. As a practical matter, however, there is little to no technical difference between wireless and VoIP p-ANI resources. CMRS and VoIP technologies are rapidly converging, and approaches such as Onvoy's, which enables dynamic location capabilities for VoIP services, are a natural part of that convergence. Because NENA sees tremendous potential for improvements in the quality of 9-1-1 service available to VoIP subscribers through this and similar approaches, we agree that waiver relief is warranted. Moreover, we urge the Commission to create a presumption that authorized VoIP service providers who wish to provide dynamic location data to PSAPs may receive access to the requisite numbering resources if they meet the criteria suggested in Onvoy's petition.

Please contact the undersigned with any questions.

Respectfully submitted,



Telford E. Forgy, III; "Trey"  
*Director of Government Affairs*